



DEPARTMENT OF THE NAVY  
NAVY ENVIRONMENTAL HEALTH CENTER  
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20 JUN 2002

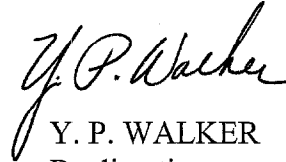
From: Commanding Officer, Navy Environmental Health Center  
To: Commanding Officer, Atlantic Division, Naval Facilities Engineering Command  
(Kirk Stevens), 1510 Gilbert Street, Norfolk, VA 23511-2699

Subj: MEDICAL REVIEW OF DRAFT RECORD OF DECISION, OPERABLE UNIT  
NO. 19 SITE 84 – BUILDING 45 AREA, MCB CAMP LEJEUNE, NC

Ref: (a) Baker Environmental, Inc., ltr of 3 Jun 02

Encl: (1) Subject Medical Review  
(2) Medical/Health Comments Survey

1. Per reference (a), we have completed a review of the subject document and forward our comments to you as enclosure (1).
2. Please complete and return enclosure (2) as your comments are needed to continually improve our services to you.
3. We are available to discuss the enclosed information by telephone with you and, if you desire, with you and your contractor. If you require additional assistance, please call Mr. Kenneth Gene Astley at (757) 953-0937 or Mr. David McConaughy at (757) 953-0942. The DSN prefix is 377. The e-mail addresses are: astleyg@nehc.med.navy.mil and mcconaughyd@nehc.med.navy.mil.

  
Y. P. WALKER  
By direction

Copy to: (w/o Encl (2))  
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MCB Camp Lejeune (ACS EMD/IRP, Tom Morris)



## NAVY ENVIRONMENTAL HEALTH CENTER ENVIRONMENTAL PROGRAMS DIRECTORATE

### Record of Decision Review

**Location:** Jacksonville, North Carolina

**Command:** Marine Corp Base Camp Lejeune

**Work Description:** Record of Decision

**Document Date:** May 2002

**Contract No/Delivery Order No:** N62470-95-D-6007/0219

**EP Document No:** 4380

**Prepared for:** LANTNAVFACENGCOM

**Prepared by:** CHM2 Hill, Baker Environmental, Inc. and CDM Federal Programs Corporation

**Date Received:** 5 May 2002

**Reviewed by:**

Kenneth Gene Astley, (757) 953-0937, [astleyg@nehc.med.navy.mil](mailto:astleyg@nehc.med.navy.mil), DSN 377

**MEDICAL REVIEW OF  
DRAFT RECORD OF DECISION  
OPERABLE UNIT NO. 19 SITE 84 - BUILDING 45 AREA  
MCB CAMP LEJEUNE, NORTH CAROLINA**

Ref: (a) Navy Interim Final Policy on the Use of Background Chemical Levels,  
Ser N453E/OU59690, 18 Sep 2000

**General Comments:**

1. The document entitled "Draft Operable Unit No. 19 Site 84 MCB Camp Lejeune, North Carolina," was provided to the Navy Environmental Health Center (NAVENVIRHLTHCEN) for review on 5 May 2002. CHM2 Hill, Baker Environmental, Inc. and CDM Federal Programs Corporation prepared the report for the Atlantic Division, Naval Facilities Engineering Command.

~~2. The baseline human health risk assessment (BHHRA) for Site 84 evaluated current Base personnel and recreational users, future industrial/commercial site workers, future construction workers and future residents. This Record of Decision (ROD) summarizes exposure scenarios excluding the soil that will be excavated during the Non-Time Critical Removal Action (NTCRA). This is very speculative and is contrary to EPA guidelines. The baseline human health risk assessment exposure point concentrations should be calculated using all of the site-specific data. Risk management decisions are made using the results of the BHHRA.~~

RETRACTED  
PER  
DAVE M.  
6/26/02  
via phone  
call w/  
KIRK STEWART

3. The groundwater exposure scenario should be eliminated from the human health risk assessment. The soil sampling found no detected inorganics exceeding screening criteria. However, several inorganics that exceeded screening criteria were included in the groundwater HHRA risk estimates. There is no reason to believe they resulted from site contamination. Pesticides were also included in the groundwater risk estimates although there is no evidence that pesticides were used at Site 84, and they also may be within anthropogenic background levels. In 2001, groundwater samples collected and analyzed for volatile organic compounds and semi-volatile organic compounds found no exceedances of screening criteria.

4. The purpose of writing this draft ROD at this time is unclear. The text states "Although metals exceeded criteria, they are present at very low levels that may be indicative of background concentrations. A Base-wide background study of metals in groundwater is currently being conducted at Camp Lejeune. Until this study is completed, it cannot be determined whether these metal concentrations are indicative of naturally occurring background concentrations." This report should have been written after the release of the base-wide background study. This report was released in May 2002 and the Base-wide background study is scheduled for release in July 2002.

## **Review Comments and Recommendations:**

1. Page 2-1, Section 2.1, "Site Description and History"  
Page 2-4, Section 2.2, "Feasibility Study"

### **Comments:**

a. The text states on Page 2-1 that the past industrial activity conducted at Site 84 was an electric substation and a maintenance facility for large machinery. The text reports no industrial activity presently at the Site. However, there is the possibility of future recreational trespassers.

b. The text states on Page 2-4 that "The preferred alternative for soil at Site 84 was developed to address polychlorinated biphenyls (PCBs), pesticides and semi-volatile organic compounds (SVOCs) that exceeded the Region IX Industrial Preliminary Remediation Goals (PRGs), USEPA remedial goals for PCBs, and North Carolina Underground Storage Tank (UST) Program remedial goals for total petroleum hydrocarbon (TPH). These remedial goals are appropriate for low-occupancy (industrial) future land uses." The remedial goals were not set for a recreational trespasser future land use scenario. The text does not confirm whether or not there are plans to develop the site. The report states that the site will not be developed for residential future land use and it appears that the industrial/commercial scenario were simply "pulled out of the hat" as a less conservative alternative. If there are no plans to develop the site for future industrial use, we suggest developing remedial goals using the trespasser recreational and maintenance worker scenarios, not the industrial/commercial. If the site is to be used as a "remote" commercial/industrial site, or only maintenance workers will be exposed to the site, the remedial goals (and risk assessment) should reflect the appropriate amount of time that will actually be spent on location

c. Reference (a) states that both naturally occurring and anthropogenic chemicals that are present at levels below background should be eliminated from consideration in the risk assessment.

d. The text provides no evidence that pesticides or semi-volatile organic compounds were used at the Site. The text does not provide background sampling information for these potentially anthropogenic chemicals.

### **Recommendations:**

- a. Ensure the remediation goals, are representative of anticipated future land use.
- b. The text provides no evidence that pesticides or semi-volatile organic compounds were used at the Site. If they are not site specific they should be eliminated from consideration in the risk assessment.

c. If the background survey for this site found that anthropogenic pesticides and semi-volatile organic chemicals are present at levels below background, then it should be eliminated from consideration in the risk assessment. The Navy policy for conducting a background evaluation is located on the Navy Risk Assessment Web Site. You may access the web site by going to <http://www.nehc.med.navy.mil/ep/index.htm> and clicking on "Navy Guidance for Conducting Human Health Risk Assessment" located at the bottom of the page. The Navy Policy link is located on the left side of the guidance home page.

FROM:	(YOUR NAME/COMMAND)
TO:	NAVENVIRHLTHCEN, ENVIRONMENTAL PROGRAMS
FAX:	COM: (757) 444-7261/DSN: 564-7261

## MEDICAL/HEALTH COMMENTS - YOUR VIEW

Please help us improve our review process by indicating the extent to which you agree or disagree with the comments we provided your activity.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
1. "Value added" to IR/BRAC process?	1	2	3	4	5
2. Received in a timely manner?	1	2	3	4	5
3. High level of technical expertise?	1	2	3	4	5
4. Very useful to the RPM?	1	2	3	4	5
5. Contractor incorporated comments?	1	2	3	4	5
6. Easily readable/useful format?	1	2	3	4	5
7. Overall review was of high quality?	1	2	3	4	5
8. NAVENVIRHLTHCEN was easily accessible?	1	2	3	4	5
9. NAVENVIRHLTHCEN input during scoping or workplan development would be "value added"?	1	2	3	4	5
10. Added involvement in IR/BRAC document needed?	1	2	3	4	5

*Please return by fax using the box provided at the top of this page. If you have any other comments, please list them below or telephone Mr. David McConaughy, Industrial Hygienist at (757) 462-5557, DSN 253, at any time to discuss your viewpoint. As our customer, your comments and suggestions on how we can improve our services to you are important!*